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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

August 28, 1991

REPLY TO ATTENTION OF:
5HS-11

Peter Vagt
Warzyn Engineering Inc.
435 Devon Park Drive
Suite 702
Wayne, PA 19087

Dear Dr. Vagt:

Enclosed are additional comments on the June 1991 version of the Baseline Risk Assessment (BRA) for the ACS NPL Site. I don't believe these comments are extensive enough to warrant an extension to the due date for your revised BRA. If you have any questions or concerns regarding these comments, please give me a call at (312) 886-7067.

Sincerely,

Wayde M. Hartwick
Remedial Project Manager

Enclosure

cc: Steve Siegel, ORC
Jim Burton, Roy F. Weston Inc.

Additional Comments on Draft Baseline Risk Assessment
for
ACS NPL Site, Griffith, Indiana

Item #

1. Page 1, line 1, insert "Hazardous Substances Pollution" between "and" and "Contingency."
2. Page 1, paragraph 2, line 1-2 should read "a vehicle or tool which may be used..." rather than "the vehicle or tool." This change is necessary since other tools may be used by EPA to evaluate risks at a site and the use of a risk assessment is not absolutely required by CERCLA.
3. Page 6, paragraph 3, line 1 should read, "the Site is located at and near 420 South Colfax..."
4. The abbreviation "ft" is lacking a period after the abbreviation throughout much of the report.
5. Pages 12-13. The ingestion of garden vegetables irrigated by contaminated water should be included as a bullet item under potential exposure pathways. Additionally, "children playing in lawn sprinklers" should be added along with "children swimming in a pool" in the first two bullets. Table 7-15 should be modified accordingly.
6. Page 16, paragraph 2. The assumption that "no evidence that exposure to contaminants...has occurred in the past" cannot be made based on current land use conditions (which are based primarily on information gathered during site visits). The entire sentence should be deleted.
7. Page 25, paragraph 2. This paragraph adds nothing to the BRA and should be deleted.
8. Page 37, section 7.1.5.2, delete sentence "Risks below this level are not considered to be of concern." All risks are of concern, but unfortunately, all may not be remediated.
9. Page 41, section 7.1.5.3.1.2. "Trespassers" needs to be defined, at a minimum, as "individuals (children, adolescents, adults) gaining unauthorized entrance to the site."
10. Page 41, paragraph 4. The included description of the effects of lead should be expanded to indicate that children are most susceptible to lead and may suffer from, among other things, permanent learning deficiencies. This is relevant since children have already been identified as a group which may use the contaminated zone as a play area.

11. Page 50, paragraph 2. This paragraph is misleading. The first sentence should be deleted. The risk situation remains unclear at this point in time.

In the second sentence, insert "but could" between "necessarily" and "reflect."

The sentence "Therefore, there are no apparent exposures associated with use of the lower aquifer and no unacceptable risks." should be modified to note that contaminants have the potential to migrate offsite.

In the sentence "Thus, private wells at Off-Site locations in both the upper and lower aquifers are not currently impacted, and no exposure (risk) is actually occurring." replace "actually" with "currently."

In the last sentence of paragraph 2, delete "extremely." These calculated risks are consistent with standard protocol.

12. Page 51. It is inappropriate to list the last item on this page as something which will overestimate Site risks when it may actually underestimate the risks. Please include this item as a separate bullet.